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December 24, 2014

**VIA FACSIMILE**

Hon. Paul E. Davison  
United States Magistrate Judge  
Southern District of New York  
300 Quarropas Street, Courtroom 620  
White Plains, NY 10601-4150

SO ORDERED:  
  
Hon. Paul E. Davison  
United States Magistrate Judge  
12-29-14

Re: Goldstein et al. v. Solucorp, et al., Case No.: 11 Civ 6227 (VLB)

Dear Judge Davison:

We represent plaintiffs in this matter. We write to request that this Court order the deposition of Richard Greene, who is an inmate at the Federal Correctional Institution – Miami, to be conducted on Tuesday, January 13, 2015, and Wednesday, January 14, 2015 at 12:00pm.

In a conference before this Court on Monday, December 8, 2014, your Honor required the deposition of Richard Greene to be conducted on or before January 30, 2015. We immediately contacted Kristen Holland, who is Mr. Greene's Correctional Counselor. Ms. Holland sent us a "Legal Visit Info" form, which we must comply with in order to conduct said deposition. Please find enclosed the Legal Visit Info form as Exhibit "A."

The Legal Visit Info form requires that "a court order must also be provided." We respectfully request this Court order the deposition of Mr. Greene to be conducted at the Federal Correctional Institution – Miami, on Tuesday, January 13, 2015, and Wednesday, January 14, 2015 at 12:00pm. We respectfully request two (2) days to depose Mr. Greene because the Legal Visit Info form restricts depositions to three (3) hours per day, and one three (3) hour period may not be sufficient.

Respectfully submitted,

Brian T. Carr (BC-2519)

cc: All counsel of Record

**AFFILIATES**

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